

1 NICHOLAS A. TRUTANICH  
United States Attorney  
2 District of Nevada  
Nevada Bar Number 13644  
3 DAVID L. JAFFE  
Chief, Organized Crime and Gang Section  
4 United States Department of Justice  
CRISTINA D. SILVA  
5 Assistant United States Attorney  
Nevada Bar No. 13760  
6 DANIEL R. SCHIESS  
Assistant United States Attorney  
7 Nevada Bar No. 5483  
CHRISTOPHER BURTON  
8 Assistant United States Attorney  
Nevada Bar No. 12940  
9 JOHN HAN  
Trial Attorney, Organized Crime and Gang Section  
10 501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
11 PHONE: (702) 388-6336  
FAX: (702) 388-5087  
12 cristina.silva@usdoj.gov  
dan.schiess@usdoj.gov  
13 chrstopher.burton4@usdoj.gov  
john.han@usdoj.gov

14 *Representing the United States of America*

15  
16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 United States of America,

19 Plaintiff,

20 v.

21 Jeremy John Halgat,

22 Defendant.

2:16-cr-00265-GMN-CWH

**Stipulation to Continue Deadline to File  
Response to Objections (ECF Nos. 1457,  
1458)**

1           The United States and defendant Jeremy John Halgat by his undersigned counsel,  
2 stipulate to continue the date by which the Government must respond to Defendant  
3 Halgat's pending objections, filed at ECF Nos. 1457 and 1458. This stipulation is entered  
4 into based on the following.

- 5           1. On December 26, 2018, this Honorable Court issued a Report and  
6           Recommendation denying Defendant Jeremy John Halgat's Motion to Dismiss.  
7           ECF No. 1416. Defendant was ordered to file objections by January 9, 2019.
- 8           2. On January 3, 2019, the parties filed a stipulation agreeing to continue the  
9           deadline for Defendant's objections, making them due by January 23, 2019.  
10          ECF No. 1436.
- 11          3. On January 23, 2019, Defendant filed Objections and Supplemental Objections.  
12          ECF Nos. 1457, 1458. The Government was ordered to respond by February 6,  
13          2019.
- 14          4. Government counsel needs additional time to review the objections, as well as  
15          the record in this case and Defendant's prior case upon which the instant  
16          litigation primarily rests.
- 17          5. This is the first stipulation to continue the deadline for the Government's  
18          response in this matter and is requested despite the fact that the current deadline  
19          has lapsed.
- 20          6. The additional time requested herein is not sought for purposes of delay and  
21          does not require a continuance of any other dates, including the currently  
22          scheduled trial and calendar call dates.

7. Based on the foregoing, the parties ask the Court to accept this stipulation and order the Government to file its Response by February 20, 2019.

DATED this 14<sup>th</sup> day of February 2019.

Respectfully,

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Richard E. Tanasi  
RICHARD E. TANASI  
*Counsel for Jeremy John Halgat*

/s/ Christopher Burton  
CRISTINA D. SILVA  
DANIEL R. SCHIESS  
CHRISTOPHER BURTON  
Assistant United States Attorneys  
JOHN HAN  
Trial Attorney

